

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

JUSTIN PAULO,

Plaintiff,

v.

BRIAN WILLIAMS, *et al.*,

Defendants.

Case No. 2:19-cv-00474-CDS-NJK

**STIPULATION AND ORDER TO  
EXTEND PROPOSED JOINT  
PRETRIAL ORDER DEADLINE**

**(FIRST REQUEST)**

Defendants Jeremy Bean, Jaymie Cabrera, Julio Calderin, Albert Castellan, Bob Faulkner, Monique Hubbard-Pickett, Julie Matousek, Michael Minev, Martin Naughton, Nonilon Peret, Craig Rose, Louisa Sanders, Harold Wickham, and Brian Williams, by and through counsel, Aaron D. Ford, Nevada Attorney General, and Mayra Garay, Deputy Attorney General, of the State of Nevada, Office of the Attorney General; and Plaintiff Justin Paulo, pro se, hereby submit their first<sup>1</sup> stipulation and agreement to extend the deadline to submit their proposed joint pretrial order and respectfully request that the

<sup>1</sup> This Court has already extended the deadline once on Mr. Paulo's unopposed motion. ECF No. 150. This is the parties' first stipulation to extend the deadline.

1 Court extend the deadline to file a proposed joint pretrial order to Monday, March 18,  
2 2024. The Parties are requesting the modification in good faith and the request is  
3 supported by good cause.

4 LR 26-3 requires that the extension of any date set by the discovery plan,  
5 scheduling order, or other order must—as well as satisfying the requirements of LR IA 6-  
6 1 to explain the reasons an extension is needed—demonstrate good cause for the  
7 extension.

8 Good cause to extend the deadline to file a proposed joint pretrial order exists.  
9 Paulo and Defense Counsel have been working together on the proposed joint pretrial  
10 order and believe they can continue working together to attempt to streamline this trial  
11 and potentially stipulate to evidence, facts, and potential witnesses. However, due to  
12 staffing limitations at High Desert State Prison, the institution cannot accommodate the  
13 necessary teleconferences that Mr. Paulo and Defendants' Counsel require to finalize the  
14 proposed joint pretrial order by the current due date. The Parties therefore respectfully  
15 seek a brief extension of the deadline.

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1 Based on the foregoing, the Parties submit that good cause exists to grant the  
2 extension and respectfully request that the deadline to submit a proposed joint pretrial  
3 order be moved to Monday, March 18, 2024.

4 Dated this 16th of February, 2024, and

Dated this 16th of February, 2024, and

5 Respectfully Submitted by:

Approved as to form and Content by:

6 AARON D. FORD  
7 Attorney General

8 /s/ Mayra Garay  
9 MAYRA GARAY (Bar No. 15550)  
Deputy Attorney General

  
JUSTIN PAUL, #1128387

*Plaintiff in proper person*

10 *Attorneys for Defendants*

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14 IT IS SO ORDERED:

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18 UNITED STATES MAGISTRATE JUDGE

19 Dated: February 20, 2024  
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CERTIFICATE OF SERVICE

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on February 16, 2024, I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND PROPOSED JOINT PRETRIAL ORDER DEADLINE (FIRST REQUEST)** via this Court's electronic filing system. Parties who are registered with this Court's electronic filing system will be served electronically.

Justin Paulo, #1128387  
High Desert State Prison  
P.O. Box 650  
Indian Springs, Nevada 89070  
Email: HDSP\_LawLibrary@doc.nv.gov  
*Plaintiff, Pro Se*

/s/ Andrea Beckett  
ANDREA BECKETT, an employee of the  
Office of the Nevada Attorney General